



GLOBAL RENEWABLE STRATEGIES AND CONSULTING LLC.

National Freedom of Information Officer
U.S. Environmental Protection Agency
1301 Constitution Avenue, NW, Room 6416 West
Washington, D.C. 20004
(202) 566-1667

Thursday, February 23, 2017

Re: Freedom of Information Act Request

To whom it may concern:

This is a request under the Freedom of Information Act.

I request that a copy of all the following documents specifically listed below be provided to me:

- 1) Any letter, notice, memo (internal or external), email (internal or external) or otherwise communication sent to Obligated Parties regarding segregation of fuel, renewable fuel or fuels that contain renewable fuels in storage tanks in the United States.
- 2) Any letter, notice, memorandum (internal or external), email (internal or external), or otherwise communication regarding Obligated Party Notifications of Affirmative Defense that are specific to Obligated Party or Quality Assurance Provider about the recent notices of violations about
 - a. Gen-X Energy Group Inc,
 - b. Southern Resources and Commodities, LLC, and
 - c. Triton Energy, LLC.
- 3) Any letter, notice, memorandum (internal or external), email (internal or external), or otherwise communication regarding notices sent to any other Renewable Fuel Standard party or person about recent fraud cases of
 - a. Gen-X Energy Group Inc.,
 - b. Southern Resources and Commodities, LLC, and
 - c. Triton Energy, LLC
- 4) Any letter, notice, memorandum (internal or external), email (external or internal), or otherwise communication regarding the methodology and determination of invalid RIN generations for Triton Energy, LLC.
- 5) Any letter, notice, memorandum (internal or external), email (external or internal), or otherwise communication regarding the notification of any party that transferred invalid RINs, or used invalid RINs for RVO compliance regardless of RIN QAP status for Triton Energy, LLC.
- 6) Any letter, notice, memorandum (internal or external), email (external or internal) between the US EPA and Genscape, EPA-approved QAP auditor that involve the determination that the Genscape QAP program is insufficient as indicated in the Notice of Revocation.
- 7) Any and all communications, notices, letters, emails or otherwise (internal or external) between any agent of the US EPA and any agent of L.T Hawthorne and Associates or Weaver Tidwell for any subject for the periods of 1 Jan 2007 through 31 Dec 2016.



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- 8) Any and all communications, notices, letters, emails or otherwise (internal or external) between any agent of the US EPA and any agent of Eco-Engineers for any subject for the periods of 1 Jan 2010 through 31 Dec 2016.
- 9) Any and all communications, notices, letters, emails or otherwise (internal or external) between any agent of the US EPA and any agent of Genscape for any subject for the periods of 1 Jan 2010 through Dec 2016.
- 10) Any and all communications, notices, letters, emails or otherwise (internal or external) between any agent of the US EPA and any agent of RIN-Trust for any subject for the periods of 1 Jan 2010 through 31 Dec 2016.
- 11) Items 7-10 also include any correspondence via the EPA EMTS support system.

To help to determine my status for purposes of determining the applicability of any fees, you should know I am affiliated with a private corporation and am seeking information for use in the company's business.

I request a waiver of all fees for this request. Disclosure of the requested information to me is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in my commercial interest. This information will be used to develop an analysis of fraud and the consequences of fraud that will enhance the awareness of the industry and the EPA "buyer beware" philosophy.

I request that the information is provided in electronic format, and I would like to receive it on a personal computer disk [or a CD-ROM]. I further request the information must be in a universally readable format such as Microsoft or Adobe products.

I ask that my request receives expedited processing because the industry is questioning the integrity of the QAP and this is causing financial harm to small renewable fuel producers that rely on the QAP. I believe this is an urgent matter that if not corrected or understood will continue financial harm to these parties. I also believe it is in the best interest of the public to share the impacts for a proper risk assessment that may mitigate risks associated with these recent activities.

I also include a telephone number at which I can be contacted during the hours of 0800-1700 EST if necessary to discuss any aspect of my request.

Thank you for your consideration of this request.

Sincerely,

Ramon M. Benavides
President

Global Renewable Strategies and Consulting, LLC.
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